

# O'TOOLE SCRIVO

A LIMITED LIABILITY COMPANY

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February 26, 2025

**Via CM/ECF**

Hon. Andre M. Espinosa, U.S.M.J.  
United States District Court, District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Courtroom MLK 2D  
Newark, New Jersey 07101

**Re: *New Wallington Home, LLC, et al. v. Borough of Wallington, et al.***  
**Civil Case No.: 20-08178 (EP) (AME)**

Dear Judge Espinosa:

This firm represents Plaintiffs in this matter. In accordance with Your Honor's February 5, 2025, Scheduling Order, Plaintiffs are in the process of finalizing a damages analysis to share with Defendants in advance of next week's March 6, 2025, settlement conference.

In light of the upcoming conference and need to finalize several of the expert reports, Plaintiffs respectfully request a 30-day extension of the current expert deadlines. Plaintiffs' expert reports are currently due to be served on February 28, 2025; Defendants responsive reports, if any, are due to be served by April 11, 2025; and expert depositions are to be completed by no later than May 16, 2025. Plaintiffs' propose the below schedule:

- (1) Plaintiffs' expert report(s) due by no later than March 30, 2025;
- (2) Defendants' expert report(s) due by no later than April 29, 2025;
- (3) Expert depositions be completed by no later than May 29, 2025; and
- (4) Dispositive motions to be served within 30 days of June 28, 2025.

Defendants' counsel has consented to this request. We thank the Court for its attention to this matter.

Respectfully submitted,

*/s/ James DiGiulio*  
James DiGiulio

cc: All Counsel of Record (via ECF)